

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER; SHANNA
ORLICH; ALLISON GAMBA; and MARY DE
LUIS,

Plaintiffs,

10 Civ. 6950 (AT) (RWL)

V.

GOLDMAN SACHS & CO. and THE
GOLDMAN SACHS GROUP, INC.,

Defendants.

DECLARATION OF ROBERT J. GIUFFRA, JR.

I, Robert J. Giuffra, Jr., pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:


1. I am a partner of Sullivan & Cromwell LLP, attorneys for Defendants in this action and a member of the Bar of the State of New York. I make this Declaration to place before this Court certain documents and information referenced in Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Relief Under Federal Rule of Civil Procedure 23 (the "Opposition").

2. Attached hereto as Appendix A is a list of 15 agreements that were executed after the Court's March 30, 2018 order granting in part Plaintiffs' motion for class certification (ECF No. 578) and that are the subject of Defendants' Motion to Stay the Claims of Certain Class Members, to Exclude Them from the Class, and to Compel Them to Arbitration ("Defendants' Motion to Compel Arbitration"). This list was compiled from information in Appendices A and C to my Declaration, dated April 12, 2019, submitted in support of Defendants' Motion to

Compel Arbitration (ECF No. 716) and Exhibit 1 to the Declaration of Eric Dias, dated June 10, 2019, submitted in support of the Opposition.

3. Attached hereto as Appendix B is a summary of information related to 2,174 class members who were or are employed by Goldman Sachs after the original Complaint was filed on September 15, 2010 and who have received document hold notices referencing this action. This information was compiled from voluminous employment-related data previously made available to Plaintiffs related to employment status at Goldman Sachs after the filing of the original Complaint on September 15, 2010, such as termination, promotion or transfer dates, and from Exhibit 1 to the Declaration of Michael Becker, dated June 6, 2019 submitted in support of the Opposition.

4. Attached hereto are true and correct copies of the following documents:

- | | |
|--|-----------|
|  | Exhibit 1 |
|  | Exhibit 2 |
|  | Exhibit 3 |
|  | Exhibit 4 |
|  | Exhibit 5 |
|  | Exhibit 6 |
|  | Exhibit 7 |

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 8

[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 9

[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 10

[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 11

[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 12

[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 13

[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 14

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Exhibit 15

February 5, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein regarding [REDACTED]

Exhibit 16

February 5, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein regarding [REDACTED]

Exhibit 17

February 5, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein regarding [REDACTED]

Exhibit 18

February 5, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein regarding [REDACTED]

Exhibit 19

February 5, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein regarding [REDACTED]

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Dated: June 11, 2019
New York, New York.

/s/ Robert J. Giuffra, Jr.
Robert J. Giuffra, Jr.